

Because power lines reach virtually every home and community in the country I believe that special considerations should be implemented, when a BPL system is installed, to reduce the amount of RF BPL signals that reach homes of those that are not subscribers. I would request that operators of BPL systems be required to install filters on the service entrance power lines of homes that are not subscribers to BPL. This filter should be installed at the pole end. This way RF signals can be prevented from entering into homes who don't want them.

Also because I have seen reports of certain utilities having trouble maintaining their equipment I would suggest that utilities employing BPL be required to make compliance measurements at installation, after system changes, and on a yearly basis to ensure that the system has not degraded and is emitting more RF signal than the rules allow for. These field strength measurements must be made in the field in the location of the BPL emitters and along the power lines. Each site has its own particular elements that may affect the level of radiated signals so just installing a certified box can not guarantee that it is in compliance.

I understand that utilities will be required to keep a database of their installation. I would ask that utilities be required to post this database on a public accessible web site. I would also ask that current BPL system status such as frequencies used, frequencies notched, levels etc be placed on this web site for public inspection. Also can it be made easy for a person experiencing interference to have a frequency band notched out? As a member of the Amateur Radio Emergency Service (ARES) I can see having to contact a utility at odd hours with interference complaints. I would not want to have to wait until a utility engineer arrives for work the following day when I need to communicate on a certain frequency for emergency purposes at 2 AM.

Because the operation of licensed radio stations may interfere with people accessing the internet over BPL I would request that BPL providers have every customer sign an acknowledgement of this information and that the possibility for interference to their internet access is possible and that the licensed services have a priority. This will alleviate the possibility of neighbor to neighbor feuds.

Finally I would ask that the part 15 limits for BPL systems be made more stringent. The levels should be reduced to protect spectrum use.

It is also my opinion that BPL will not work without generating interference.

Respectfully submitted:
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